

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

Robert Ward, *on his own behalf and on behalf*
of all others similarly situated,

Plaintiff,

v.

Flagship Credit Acceptance LLC,

Defendant

Civil Action No.: 2:17-cv-02069-MMB

**MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiff Robert Ward (“Plaintiff”), by and through his undersigned counsel and having reached a class action settlement agreement with Defendant Flagship Credit Acceptance LLC (“Flagship” or “Defendant”) (collectively, the “Parties”), respectfully moves this Court, pursuant to Federal Rule of Civil Procedure 23, for an order: (1) granting preliminary approval of the Class Action Settlement (the “Settlement”) in this matter, (2) certifying the proposed Settlement Class for settlement purposes, (3) approving the form and content of the Notice to be sent to the members of the Settlement Class pursuant to the plan detailed in the Settlement Agreement, (4) appointing proposed Class Counsel and the Class Representative to represent the Settlement Class, and (5) scheduling a final fairness hearing.

In support, the Plaintiff submits the accompanying Memorandum of Law in Support of Plaintiff’s Motion for Preliminary Approval of Class Action Settlement, the executed Settlement Agreement and its exhibits (1-6), the declarations of proposed Class Counsel Sergei Lemberg and Stephen Taylor and a declaration from the Settlement Administrator.

For the reasons set forth in the accompanying memorandum, Plaintiff respectfully requests that the Court enter the Preliminary Approval Order in the form agreed to by the Parties as Exhibit 5 to the Settlement Agreement and submitted herewith as Exhibit A to this motion.

Dated: July 12, 2018

Respectfully submitted,

Robert Ward, *individually and on behalf of all others similarly situated*,

By: /s/ Stephen Taylor

Sergei Lemberg
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CERTIFICATE OF SERVICE

I, Stephen Taylor, an attorney, certify that, on July 12, 2018, the foregoing was filed with the Clerk of the Court through the CM/ECF system which sent notice of such filing to the following:

Gerald E. Arth
Steven J. Daroci, II
Fox Rothschild LLP
2000 Market Street, 20th Floor
Philadelphia, PA 19103

/s/ Stephen Taylor
Stephen Taylor